

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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MILBERG LLP,

Petitioner,

v.

Case No.: 19-cv-04058

HWB ALEXANDRA STRATEGIES PORTFOLIO;
HWB DACHFONDS – VENIVIDIVICI;
HWB GOLD & SILBER PLUS;
HWB PORTFOLIO PLUS;
HWB RENTEN PORTFOLIO PLUS;
HWB VICTORIA STRATEGIES PORTFOLIO;
DRAWRAH LIMITED;
NW GLOBAL STRATEGY;
U.V.A. VADUZ;
VICTORIA STRATEGIES PORTFOLIO LTD.,
KLAUS BOHRER; and
UTE KANTNER;

Respondents.
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**DECLARATION OF WILLIAM F. DAHILL IN SUPPORT OF MILBERG’S
PETITION AND MOTION TO VACATE THE FINAL ARBITRATION AWARD**

I, WILLIAM F. DAHILL, hereby declare:

1. I am a partner with the law firm Wollmuth Maher & Deutsch LLP, counsel for Petitioner, Milberg, LLP (“Milberg”) in this action. I am familiar with the facts set forth herein on the basis of my personal knowledge and review of documents in the possession of my firm.

2. I submit this declaration in support of Milberg’s Petition and Motion to Vacate the Final Arbitration Award.

3. Annexed hereto as **Exhibit 1** is a true and correct copy of the Final Arbitration Award in the Matter of the Arbitration between Milberg LLP v. HWB Alexandra Strategies Portfolio, et al, Case No. 01-17-0004-6221 (the “Arbitration”), dated February 4, 2019.

4. Annexed hereto as **Exhibit 2** is a true and correct copy of Milberg’s Statement of Claim in the Arbitration, dated August 3, 2017.

5. Annexed hereto as **Exhibit 3** is a true and correct copy of the sworn written direct testimony of Michael Spencer, dated July 20, 2018.

6. Annexed hereto as **Exhibit 4** is a true and correct copy of Claimant’s Exhibit 43 in the Arbitration.

7. Annexed hereto as **Exhibit 5** is a true and correct copy of Claimant’s Exhibit 49 in the Arbitration.

8. Annexed hereto as **Exhibit 6** is a true and correct copy of Claimant’s Exhibit 143 in the Arbitration.

9. Annexed hereto as **Exhibit 7** is a true and correct copy of Claimant’s Exhibit 201 in the Arbitration.

10. Annexed hereto as **Exhibit 8** is a true and correct copy of Claimant’s Exhibit 382 in the Arbitration.

11. Annexed hereto as **Exhibit 9** is a true and correct copy of Claimant’s Exhibit 393 in the Arbitration.

12. Annexed hereto as **Exhibit 10** is a true and correct copy of Claimant’s Exhibit 375 in the Arbitration.

13. Annexed hereto as **Exhibit 11** is a true and correct copy of Respondents’ documents requests, dated February 13, 2018.

14. Annexed hereto as **Exhibit 12** is a true and correct copy of a letter dated May 16, 2018 from Respondents' counsel to Petitioner's counsel.

15. Annexed hereto as **Exhibit 13** is a true and correct copy of a letter dated July 6, 2018 from Respondents' counsel to the Arbitration Panel.

16. Annexed hereto as **Exhibit 14** is a true and correct copy of the Arbitration Panel's Order No. 8, excluding certain time records from being introduced into evidence and used in testimony.

17. Annexed hereto as **Exhibit 15** is a true and correct copy of Claimant's Exhibit 312 in the Arbitration.

18. Annexed hereto as **Exhibit 16** is a true and correct copy of Claimant's Exhibit 346 in the Arbitration.

19. Annexed hereto as **Exhibit 17** is a true and correct copy of Claimant's and Counterclaim-Respondents' Pre-Hearing Brief in the Arbitration.

I declare under penalty of perjury under the laws of the United States of America and the State of New York that the foregoing is true and correct.

Dated: New York, New York
May 6, 2019

By: /s/ William F. Dahill
William F. Dahill